## **REMARKS/ARGUMENTS**

Applicant would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office Action, and the following remarks are presented for the Examiner's consideration.

Claim 1 has been amended and claims 2-8 have been canceled. New dependent claims 9-14 have been added by amendment.

The abstract of the disclosure was objected to and has been amended appropriately herein.

The specification was objected to for informalities. The specification has been amended herein to insert appropriate headings.

The drawings were objected to for failing to include the reference characters "16" referred to in claim 4. Claim 4 has been canceled by amendment herein, thereby rendering the objection moot.

Claims 3-7 were rejected under 35 U.S.C. 112, second paragraph as being indefinite. Claims 3-7 have been canceled by amendment herein, thereby rendering the objection moot.

Claims 1-3 were rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 4,491,325 to Bersheim (hereinafter "Bersheim"). Claims 2-3 have been canceled. Claim 1 has been amended and, for the following reasons, the rejection is now respectfully traversed.

Regarding amended claim 1, Bersheim does not teach "displacement actuators which are controlled by simulation action responses, said responses originating from a virtual environment," as required. As set forth in the claim, the displacement actuators are controlled by simulation action responses originating from a virtual environment. By contrast, the actuators of Bersheim, namely a handle having a trigger (12) and a push button (13), are input devices that are controlled by a user. Thus, any displacement of trigger (12) and pushbutton (13) originate from the real world (i.e. the user's hand), not from a virtual environment as required by claim 1.

Appl. No. 10/541,631

Amdt. dated October 22, 2009

Reply to Office Action of April 28, 2009

Put another way, the actuators of claim 1 are output devices that convert action in a virtual world into action in the real world (i.e. displacement of the actuators), whereas the actuators (12, 13) of Bersheim convert action in the real world (movement of the trigger or button by the user's hand) into action in a virtual world (i.e. control of a video game). Accordingly, all of the limitations of amended claim 1 are not anticipated by Bersheim and the rejection should be withdrawn.

Claims 1, 2 and 4-7 were rejected under 35 U.S.C. 103(a) as being unpatentable over Bersheim in view of U.S. Patent No. 6,854,352 to Onodera (hereinafter "Onodera"). Claims 2 and 4-7 have been canceled. Claim 1 has been amended and, for the following reasons, the rejection is now respectfully traversed.

As explained above, Bersheim teaches a input devices that are operated by a user, rather than actuators that are controlled by responses received from a virtual world. Similarly, Onodera teaches a an input apparatus (i.e. joystick controller) that receives an input from a user manipulating an operating member (i.e. joystick). The Office action suggests that the motors (2, 3) shown and described in Onodera are used to provide force feedback to the operating member. Applicant respectfully disagrees.

As explained in Onodera, the motors (2, 3) are provided to translate the tilting motion of the operating member (joystick) into rotational movement to drive two corresponding rotary-type electrical components (4, 5) (i.e. potentiometers). See, e.g. column 3, lines 39-50. Nowhere in Onodera is there any teaching or suggestion of using the motors (2, 3) to provide force feedback, or to otherwise displace the operating member in response to a simulation action response originating in a virtual world as required by claim 1.

Therefore, even if the teachings of Bersheim and Onodera were combined, the resulting combination would not teach, suggest or otherwise render obvious "displacement actuators which are *controlled by simulation action responses*, said responses *originating from a virtual environment*," as required by claim 1. Accordingly, a *prima facie* case of obviousness cannot be made, and it is respectfully requested that the rejection be withdrawn.

Claim 3 was rejected under 35 U.S.C. 103(a) over Bersheim in view of U.S. Patent No. 6,550,562 to Brandt et al. (hereinafter "Brandt"). Claim 3 has been canceled by amendment herein, thereby rendering the rejection moot.

Appl. No. 10/541,631

Amdt. dated October 22, 2009

Reply to Office Action of April 28, 2009

New claims 9-14 each depend from claim 1, either directly or indirectly, and are therefore

patentable for at least the same reasons as set forth above with regard to claim 1.

In consideration of the foregoing analysis, it is respectfully submitted that the present

application is in a condition for allowance and notice to that effect is hereby requested. If it is

determined that the application is not in a condition for allowance, the examiner is invited to

initiate a telephone interview with the undersigned attorney to expedite prosecution of the

present application. If there are any fees resulting from this communication, please charge same

to our Deposit Account No. 16-0820, our Order No. BRV-38334.

Respectfully submitted,

PEARNE & GORDON LLP

By: /Aaron A. Fishman/

Aaron A. Fishman, Reg. No. 44,682

1801 East 9th Street **Suite 1200** Cleveland, Ohio 44114-3108

(216) 579-1700

Date: October 22, 2009

7